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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

In the Matter of)
)
Comment Requested on a La Carte and Themed)
Tier Programming and Pricing Options for) MB Docket No. 04-207
Programming Distribution on Cable Television)
And Direct Broadcast Satellite Systems)

Thank you for this opportunity to submit comments about some of the barriers that minority cable television networks face and how offering minority cable television networks on an a la carte basis could remove some of those barriers.

My name is Peggy Dodson. I am the owner, producer, and hostess of both the “Economic Empowerment” and “World Beat” television shows. I am also the founder, president, and CEO of the Urban Broadcasting Company (UBC). UBC is a relatively new multiple media network that distributes cable television programming that targets people of color.

I founded UBC because the cable industry has failed miserably to satisfy many of the viewing needs of people of color. For the most part, the cable industry has ignored the call of people of color to provide meaningful programming that appeals to more than their musical and athletic interests. UBC is working hard to distribute such programming.

UBC programming includes movies, documentaries, music programs, and more. UBC is taking Black college sports to the next level. UBC has an exclusive contract to produce and broadcast the football and basketball games of historically Black Florida A&M University (FAMU). UBC delivered FAMU football games to 40,000,000 households last football season.

Nevertheless, despite high demand for its programming, UBC has great difficulty obtaining carriage deals. Most investors demand large ownership stakes and content control in UBC. However, ceding ownership and content control is not an option, because the programming of minority cable television networks that do so usually degenerates into stereotypical images of people of color.

Cable television carriers do not help matters much. Take Comcast for example. *CableWorld* says, “[b]y virtue of its size, Comcast has become the diginets’ kingmaker, with the power to make or break a digital network. Without a carriage commitment from Comcast, it is difficult for start-ups to raise the investment

capital they need. That's 'at least \$3 million, but more like \$5 million" to get them started on the road to \$100 million....'"

UBC also has difficulty obtaining carriage deals, because many cable television carriers find little to no value in meaningful and tasteful programming that targets people of color. This is unfortunate, because people of color have actual stories that need to be told. These stories go well beyond the sensational and stereotypical.

In the end, UBC is denied carriage deals. Cable carriers often tell minority cable television networks that there is already enough programming that targets people of color. Cable carriers also tell minority cable television networks that too many consumers are not willing to pay for minority cable networks to be added to their already expensive cable television packages.

In short, the current cable television system simply does not work for minority cable television networks. It either shuts them out completely or squeezes them until they are only shells of what they were originally intended to be. Many African Americans have expressed to me their disappointment with the current cable television system providing African Americans primarily music programming, as if singing and dancing is all that interests them.

Fortunately, a la carte could open up the cable industry to minority cable television networks, such as UBC. If consumers were able to purchase minority cable television networks on an a la carte basis, cable carriers would have no excuse not to enter into carriage deals with minority cable television networks. Currently, cable carriers claim that they do not enter into such deals, because, as mentioned above, too many consumers are not willing to pay for minority cable networks to be added to their cable packages. This would not be an issue if minority cable television networks were offered on an a la carte basis, because then only consumers who want minority cable networks would have to pay for them.

In closing, drastic change is needed in the cable industry if it is to adequately serve people of color. Currently, minority cable television networks are wholly shut out of the cable industry. There is not one independent and national African American cable television network. Viacom owns BET. Comcast practically owns TvOne. In a nation such as ours, a nation that thrives on diversity, we surely can do better than this. If a la carte can help us do better, I support it.

Sincerely,

Peggy Dodson
Chairman & Chief Executive Officer
Urban Broadcasting Company